



## **KEEPCON Privacy Policy**

Keepcon is a customer experience management tool (CEM), which comprises the companies Keepcon Corp and Community Mind SRL, hereinafter referred to as Keepcon. The Keepcon system is a tool that enables companies and organizations to process and manage publicly available information about their brand on the Internet or the information which the owner reveals to Keepcon's client through different private channels of digital communication and authorizes its use for the purposes defined herein.

Keepcon system aggregates and saves a record of publicly available and private information about your interaction with a company or organization on the Internet or in any source or means of information used to interact.

Keepcon proactively encourages each of its Customers to engage in privacy best practices. While Keepcon cannot guarantee that its Customers will abide by the best practices in user privacy, it does its best to ensure that everyone that is part of its ecosystem is aware of those practices and has received concrete guidance and/or training concerning implementation. Of course, Keepcon Customers are responsible for their own use of the Keepcon platform. Please review the Customers' individual terms of service and privacy policies for information on their privacy practices. Additionally, please review our Privacy Shield notice related to transfers of personal information from the European Union to the U.S. below.

Commitments that we have with our customers:

### **Notification**

When Keepcon collects your personal information, we give you timely and appropriate notice describing what personal information we are collecting, how we will use it and the types of third parties with whom we may share it. This notice is located in this policy. Keepcon advises its customers to provide similar notice to their unique customers and partners of their use of the Keepcon system.

### **Option**

Keepcon will give you choices about the ways we use and share your personal information, and we will respect the choices you make. Please recognize that Keepcon is a system used by Customers and, as such, we advise and encourage our Customers to take appropriate action with respect to their own privacy standards as it relates to social media management.

**Restriction**

Keepcon will collect only as much personal information as is required to meet the specific, identified purposes of Customer contracts, and we will not use it for other purposes without obtaining your consent.

**Limitation**

Keepcon will keep your personal information only as long as we need it for the purposes for which we collect it, or as permitted by law, or Customers collect indicated.

**Accuracy**

Keepcon will take appropriate steps to make sure your personal information in our records is accurate, as much as is within the power of Keepcon as a system used by its Customers.

**Transparency**

Keepcon will provide ways for you to access your personal information as quickly as possible upon request, as required by law, so you can correct inaccuracies. Please use the address below to request access to your information.

**Protection**

Keepcon will take appropriate physical, technical and organizational measures to protect your personal information from loss, misuse, unauthorized access or disclosure, alteration, and destruction. Keepcon and its Customers enter into agreements requiring that keepcon use industry standards with respect to storage of data and the security of its system.

**Sharing**

Except as described herein, Keepcon will not share your personal information with third parties without your consent. As standard policy, Keepcon's Customer agreements prohibit the sharing of information beyond communication with a specific Customer.

Keepcon uses a limited number of third party service providers to assist us in providing our services to customers. These third party providers help us offer customer support to our customers, perform database monitoring and other technical operations, assist with the transmission of data, and provide data storage services. These third parties may process or store personal data in the course of providing their services. Keepcon maintains contracts with these third parties restricting their access, use, and disclosure of personal data in compliance with our Privacy Shield obligations, this private policy, and Keepcon may be liable if they fail to meet those obligations and we are responsible for the event giving rise to the damage.

In some cases, it may be necessary to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

### **International Transfer**

If Keepcon is used to transfer your personal information to another country, Keepcon will take appropriate measures to protect your privacy and the personal information transferred.

### **Commitment**

Keepcon will regularly review how we are meeting these privacy promises, and we provide an independent way to resolve complaints about our privacy practices.

To access your information, ask questions about our privacy practices, or issue a complaint, contact us at:

Keepcon Privacy Compliance  
1220, North Market Street  
Wilmington, Delaware (19801)  
(+5411) 4786 5787 [privacy@keepcon.com](mailto:privacy@keepcon.com)

### **Content Generated by Children**

Keepcon are committed to respecting the privacy of children online and ensuring that Keepcon is compliant with the Children's Online Privacy Protection Act (COPPA). If Keepcon learns that the information of a child under the age of 13 is stored within its platform, Keepcon will promptly notify Customer representatives and delete any personal information in that user's account or any other profile information that Keepcon has been used for.

Keepcon's indexing of publicly or private available information will include information from public websites or from other communication channels with the client and profiles that may have in error granted accounts to children under the age of 13. Keepcon is not accountable for the faulty verification practices deployed by third party websites or social channels.

### **Description of Keepcon System**

Keepcon is a system used by companies to understand, in real time, what their clients are saying in social media and other digital channels.

In order to do so, Keepcon uses a natural language processing technology created especially for such end and which it owns, which is used to classify and extract relevant information from all your interactions with the companies that use Keepcon's system and become their Clients.

For Keepcon to process your interactions with the companies that use Keepcon's system, it is necessary for the companies to grant Keepcon specific access permits to the different digital channels which the Clients may deem necessary for their business.

Clients using Keepcon grant said company specific licenses for Keepcon to access and process contents from the following sources of information:

- › Facebook Official Fan Pages
- › Twitter Official Account
- › LinkedIn
- › Instagram Official Account
- › Online Chat channels
- › Customer Service Email accounts
- › YouTube Channels
- › Forums
- › Blogs and comments
- › Digital voice records
- › Digital documents (PDF, Word, etc.)
- › Online Forms
- › Online Polls
- › Other digital channel of the Company

Keepcon does not circumvent any of your personal privacy settings on any of the platforms that it indexes content from. Keepcon does not bear responsibility for its Customers use of the platform. Keepcon has implemented security practices to account for this use of the platform as a safeguard.

Clients using Keepcon's system, request Keepcon the kind of information that should be classified, extracted and stored in the database.

### **Information processed by Keepcon**

Keepcon's Customers are the ones who are indexing content using the Keepcon system. Keepcon requires each one of its customers to sign agreements with Keepcon that align with Keepcon's privacy practices. We also require, as part of the customer agreements, that Keepcon's Customers agree to abide by the policies of third-party websites, such as Facebook and Twitter, as well as comply with all applicable laws and regulations, including, but not limited to, privacy laws and regulations. Keepcon works arduously to ensure that it is in compliance with the laws of all international jurisdictions in which its Customers may use the platform.

## Information that clients can process and store in Keepcon

We believe that the holders of information have the right to know the kind of information we collect. When Keepcon processes the information from your interaction with a Keepcon's Client that uses Keepcon's system, Keepcon can be used to extract and store the following information from processed interactions:

- › Names and surnames
- › ID numbers
- › Gender and age
- › Geographical location information
- › Useful information for the Customer Service Department of companies, such as: client number, receipt number, type of claim, telephone number, emails address, etc.
- › Sentiment on different aspects, such as: a product or brand, politics, marketing campaigns, events organized by the company, TV shows, digital content, cultural subjects, etc.

## Keepcon Semantic Technology

Contents imported to the Keepcon Platform will be automatically categorized based on the classification rules determined by the company. Keepcon personnel will configure its semantic processing engine to produce the required classification tags. Classification may include multiple labels, such that a single content may be classified in various aspects simultaneously. Furthermore, Keepcon's semantic technology allows for the identification of emergent topics in the community without the need for a tag which identifies them.

## Automated Actions

Once the contents have been processed and classified, the company that uses Keepcon can configure the system to evaluate for sufficient evidence in order to take an automated action based on the rules decided by the company. The automated actions can include one or more of the following:

- › Response to the user
- › Elimination of inappropriate content
- › Referral to an operator according to topic, urgency or other defined criteria
- › Approval of content and termination of its cycle

## Communication

The Keepcon system allows its clients to communicate with users who contacted the company through private digital channels, posted content on social networking services or used any kind of customer service channels. Keepcon clients agree to abide by the policies of third-party websites, such as Facebook and Twitter, as well as comply with all applicable laws and regulations, including, but not limited to, privacy laws and regulations.

Keepcon works arduously to ensure that it is in compliance with the laws of all international jurisdictions in which its Customers may use the platform.

Any private communications between Keepcon Customers and Internet users through the Keepcon platform are maintained in accordance with the terms of the customer agreements.

### **Targeting**

The Keepcon platform also allows its customers to post advertisements and campaigns. As part of the customer agreements Keepcon Customers agree to abide by the advertising policies of third-party websites, such as Facebook and Twitter, as well as comply with all applicable laws and regulations relating to such advertising.

### **Accessing Your Information Stored on the Keepcon Platform**

You have the right, upon written request, to access information that Keepcon processes. If such content is found, Keepcon will inform you about such content (limited by others' privacy interests or legal rights), how it is being used and other information as required under applicable law. This obligation is only in relation to content that is directly held by Keepcon, not in any information that is held by its Customers and not Keepcon.

To make a request, please send a letter or an email to the abovementioned Keepcon Privacy Compliance. Please include the following information in your request:

- › Your Name;
- › Your Contact Information, including phone number, address and email; and
- › The Precise nature of your request.

### **Keepcon and Participation in E.U.-U.S. Privacy Shield**

Some of our Customers' use of the Keepcon system may require a cross-border transfer of personal information.

Keepcon has self-certified its compliance with the E.U.-US Privacy Shield Framework, as set forth by the US Department of Commerce, regarding the collection, use, and retention of personal information from European Union (EU) member countries. Keepcon adheres to the Privacy Shield

principles of Notification, Option, Accountability for Onward Transfer, Protection, Data Integrity and Purpose Limitation, Transparency, and Recourse, Commitment, and Liability.

If there is any conflict between the statements in this policy and the Privacy Shield principles, the Privacy Shield principles shall govern. By choosing to participate in the Privacy Shield, we have agreed to abide by the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC) or any other U.S. authorized statutory body.

To learn more about the Privacy Shield program and to view our certification, please visit

<https://www.privacyshield.gov/>

## Disputes

In compliance with the Privacy Shield Principles, Keepcon commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Private Shield policy should first contact Keepcon at [privacy@keepcon.com](mailto:privacy@keepcon.com). If contacting us does not resolve your complaint, you may file a complaint, free of charge, with the EU Data Protection Authorities (EU DPAs).

Keepcon has further committed to cooperate with EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact the EU DPAs for more information or to file a complaint. The services of EU DPAs are provided at no cost to you.

If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms.

## General Amendments and Updates to this Keepcon System Privacy Policy

This Privacy Policy may be amended from time to time consistent with applicable laws. Keepcon will provide notification of changes to this Privacy Policy through the Keepcon website.